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August 26, 2021

Via ECF and email

Hon. Vernon Broderick  
Courtroom 518  
United States District Court  
40 Foley Square  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 8/27/2021

Re: *Ricardo Castro and Jeff Jackson v. AABC Construction, Inc. et al.*  
17 Civ. 01205 (VSB) (KNF)

Dear Judge Broderick:

This firm represents defendant Daniel Sheeri and we request a second, short extension of the deadlines for pretrial submissions by two weeks. The first request was jointly made by both parties and this second request is made by the defendant with the consent of Plaintiff's counsel. On Monday of this week, I moved my law practice to another firm and, since then, I have been attending to numerous, time-consuming administrative issues and procedures getting onboarded to the new firm and transitioning my pending cases.

Accordingly, we request:

(1) extending the deadline for submission of a joint-pretrial order and motions *in limine* through September 13, 2021; and

(2) extending the deadline for submission of opposition to motions *in limine*, proposed voir dire questions, proposed verdict sheets, and proposed jury instructions through September 27, 2021.

Your Honor's consideration of this request is greatly appreciated.

Respectfully submitted,

*David H. Wander*

David H. Wander, Esq.

cc via email:  
Chris Neff, Esq.